

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

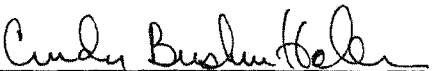
STATE OF ILLINOIS,)	
ILLINOIS DEPARTMENT OF)	
TRANSPORTATION)	
)	
Petitioner,)	
)	
v.)	Docket No. T09-0074
)	
THE TERMINAL RAILROAD)	
ASSOCIATION OF ST. LOUIS (TRRA))	
)	
Respondent.)	
)	
Petition for an Order granting authority to)	
construct two grade separation structures)	
carrying Relocated Interstate Route 70)	
(FAP Route 999) over and across Wiggins)	
Ferry Company's property, including)	
TRRA's Wiggins #2 yard tracks at)	
Railroad Mile Post 1.9 Wiggins Main,)	
near the Village of Brooklyn in St. Clair)	
County, Illinois)	

PETITIONER'S NOTICE OF FILING
MOTION FOR LEAVE TO FILE AMENDMENT TO PETITION AND REVISED
EXHIBIT 1 TO PETITION AND
MOTION FOR LEAVE TO FILE ADDITIONAL APPEARANCE

PLEASE TAKE NOTICE that Petitioner, The State of Illinois, Illinois Department of Transportation, by and through its counsel, hereby files: (1) Motion For Leave To File Amendment To Petition and Revised Exhibit 1 to Petition and (2) Motion For Leave To File Additional Appearance, copies of which are attached and hereby served upon you.

Respectfully submitted,

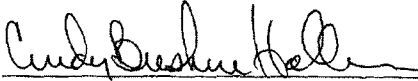
ILLINOIS DEPARTMENT OF TRANSPORTATION

By: 
Cindy Bushur-Hallam
Special Assistant Attorney General

Dated: July 23, 2009
Illinois Department of Transportation
2300 South Dirksen Parkway
Springfield, IL 62764
Telephone (217) 782-3215

CERTIFICATE OF SERVICE

I, Cindy Bushur-Hallam, an attorney, hereby certify that I caused to be served the foregoing Petitioner's Notice and Motion For Leave To File Amendment To Petition and Revised Exhibit 1 to Petition and Motion For Leave To File Additional Appearance upon the individuals on the attached service list by first class mail via the United States Post Office on July 23, 2009.


Cindy Bushur-Hallam

ILLINOIS COMMERCE COMMISSION

Service List in T-09-0074

Douglas P. Borgmann
Attorney
Bryan Cave LLP
One Metropolitan Square
211 North Broadway, Suite 3600
St. Louis, MO 63102-2750

Christine Reed
Director of Highways – IDOT
Attn: Jeff Harpring, Room 205
2300 South Dirksen Parkway
Springfield, IL 62764
E-mail: jeff.harpring@illinois.gov

Cindy K. Bushur-Hallam
Special Assistant Chief Counsel
Illinois Department of Transportation
2300 S. Dirksen Pkwy
Springfield, IL 62764
E-mail: cindy.bushur-hallam@illinois.gov

Ellen Schanzle-Haskins
Chief Counsel – IDOT
2300 South Dirksen Parkway, Room 300
Springfield, IL 62764
E-mail: ellen.schanzle-haskins@illinois.gov

Gloria M. Camarena
Assistant Chief Counsel
Illinois Department of Transportation
JRTC-Suite 6-600
100 West Randolph
Chicago, IL 60601
E-mail: gloria.camarena@illinois.gov

8727229_v1

Timothy E. Duggan
Attorney at Law
426 South Fifth Street
Springfield, IL 62701

Ted Ingram
General Superintendent
Terminal Railroad Association of St. Louis
1201 McKinley Street
Venice, IL 62090
E-mail: tingram@terminalrailroad.com

Lance T. Jones
Deputy Chief Counsel
Illinois Department of Transportation
2300 South Dirksen Parkway, Suite 311
Springfield, IL 62764
E-mail: lance.jones@illinois.gov